

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

CHRISTOPHER SCOTT BURRELL	)	
	)	
COMPLAINANT	)	
	)	
V.	)	CASE NO.
	)	2022-00324
FARMDALE WATER DISTRICT	)	
	)	
DEFENDANT	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO CHRISTOPHER SCOTT BURRELL

Christopher Scott Burrell, pursuant to 807 KAR 5:001E, is to file with the Commission the following information by either mailing the response to the Public Service Commission at 211 Sower Boulevard, Frankfort, Kentucky 40602, or by emailing the response to [PSCED@ky.gov](mailto:PSCED@ky.gov). The information requested is due on March 14, 2023.

Each response shall include the question to which the response is made and shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

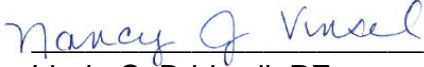
Mr. Burrell shall make timely amendment to any prior response if he obtains information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Mr. Burrell fails or refuses to furnish all or part of the requested information, he shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When filing a paper containing personal information, he shall, in accordance with 807 KAR 5:001E, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Identify any plumber hired to install the service line from the meter to your barn.
2. Identify the date the service line was installed from the meter to your barn.
3. Provide copies of any invoices received for or documentation reflecting work performed on your behalf to install the service line from the meter to your barn.
4. Refer to Farmdale Water District's Answer filed January 20, 2023. Admit or deny the following allegations made by Farmdale Water District:
  - a. Mr. Burrell had someone who is not a licensed plumber install the service line from the meter to the barn;
  - b. The person who was backfilling the trench ran across it several times with a Bobcat (mini-excavator); and

c. This person caused the service line to be pushed down in the trench ultimately causing the pigtail to be “yanked out” from the meter setter.

5. State what was done to repair the water connection after the leak.
6. Identify any plumber hired to repair the water connection after the leak.
7. Provide copies of any invoices received for or documentation reflecting work performed on your behalf to the water connection after the leak.

 *Nancy J. Vinsel* For  
Linda C. Bridwell, PE  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

DATED     FEB 17 2023    

cc: Parties of Record

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